

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

**ASSENTED-TO MOTION FOR EXCLUSION OF TIME UNDER THE SPEEDY TRIAL ACT**

The United States of America respectfully moves the Court to exclude the time period from September 13, 2021 through and including February 28, 2022, from the speedy trial clock, pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv), on the ground that the ends of justice served by excluding this period outweigh the public and defendant's interest in a speedy trial.

The time period between September 13, 2021 and February 28, 2022 will allow defense counsel to review additional evidence produced in the case, and will allow the newly-assigned government attorneys to review the case file. It will also allow both parties to prepare for trial and potentially discuss resolution of the case. Thus, this period constitutes “the reasonable time necessary for effective preparation, taking into account the exercise of due diligence,” and the ends of justice served by granting the requested continuance outweigh the best interests of the public and the defendant in a speedy trial pursuant to the Speedy Trial Act, Speedy Trial Act, §§ 3161(h)(7)(A) and (B)(iv).

Respectfully submitted,

NATHANIEL R. MENDELL  
ACTING UNITED STATES ATTORNEY

Date: August 19, 2021

By: /s/ Mackenzie A. Queenin  
Mackenzie A. Queenin  
Assistant U.S. Attorney

/s/ Babasijibomi Moore  
Babasijibomi Moore  
Trial Attorney

CERTIFICATE OF SERVICE

I, Mackenzie A. Queenin, hereby certify that the foregoing was filed through the Electronic Court Filing system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

Date: August 19, 2021

/s/ Mackenzie A. Queenin  
Assistant United States Attorney